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BEFORE THE ARIZONA CORPORATION COMMISSION

2002 SEP 18 P 12: 30

WILLIAM A. MUNDELL  
Chairman  
JIM IRVIN  
Commissioner  
MARC SPITZER  
Commissioner

Arizona Corporation Commission

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SEP 18 2002

AZ CORP COMMISSION  
DOCUMENT CONTROL

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CMR

IN THE MATTER OF THE GENERIC  
PROCEEDINGS CONCERNING ELECTRIC  
RESTRUCTURING ISSUES

Docket No. E-00000A-02-0051

IN THE MATTER OF ARIZONA PUBLIC  
SERVICE COMPANY'S REQUEST FOR A  
VARIANCE OF CERTAIN REQUIREMENTS  
OF A.A.C. R14-2-1606

Docket No. E-01345A-01-0822

IN THE MATTER OF THE GENERIC  
PROCEEDING CONCERNING THE  
ARIZONA INDEPENDENT SCHEDULING  
ADMINISTRATOR

Docket No. E-00000A-01-0630

IN THE MATTER OF TUCSON ELECTRIC  
POWER COMPANY'S APPLICATION FOR A  
VARIANCE OF CERTAIN ELECTRIC  
COMPETITION RULES COMPLIANCE  
DATES

Docket No. E-01933A-02-0069

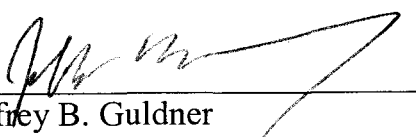
RESPONSE OF ARIZONA PUBLIC SERVICE COMPANY  
TO  
STAFF REQUEST FOR PROCEDURAL ORDER

Arizona Public Service Company ("APS" or "Company") hereby expresses its support for the Request for Procedural Order filed by the Arizona Corporation Commission ("Commission") Utilities Division Staff ("Staff") on September 16, 2002. Although the workshops are helpful in narrowing the issues, the Company agrees with Staff's conclusion that the likelihood of total consensus among such a diverse group (consumer representatives, incumbent utilities, merchant generators of varying types, distributed generation advocates, solar energy proponents, etc.) is small. Staff's proposed schedule, although ambitious, represents the best chance of meeting the Commission's direction in Decision No. 65154 and should therefore be adopted.


1 APS would further request that any Procedural Order issued in response to Staff's  
2 Motion direct that all parties provide to each party of record two (2) copies of any work-  
3 papers associated with their report/testimony concurrent with the filing of such  
4 report/testimony. This will speed discovery and lend support to the tight schedule proposed in  
5 the Motion.

6 RESPECTFULLY SUBMITTED THIS 18<sup>th</sup> day of September 2002.

7 SNELL & WILMER L.L.P.

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9   
10 Jeffrey B. Guldner

11  
12 and

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14   
15 Thomas L. Mumaw  
16 Senior Attorney  
17 Pinnacle West Capital Corporation  
18 Law Department

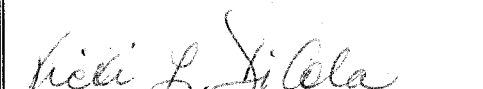
Attorneys for Arizona Public Service  
Company

19 Original and fifteen copies of the  
20 Foregoing filed this 18<sup>th</sup> day of  
September, 2002, with:

21 Docket Control  
22 Arizona Corporation Commission  
23 1200 West Washington  
Phoenix, AZ 85007

24 The foregoing mailed or e-mailed this  
25 18<sup>th</sup> day of September, 2002, to:

26 All Track B parties of record

27   
28 Vicki L. Dicola